



Columbus | Cincinnati | Cleveland | New Jersey | New York

Dann  
Law201-355-3440  
Direct TelephoneJavier L. Merino, Esq.\*  
[JMerino@DannLaw.com](mailto:JMerino@DannLaw.com)  
Email216-373-0536  
Fax

June 19, 2024

**Via ECF**

Hon. Philip M. Halpern, U.S.D.J.  
 The Hon. Charles L. Brieant Jr. Federal Building and Courthouse  
 300 Quarropas St.  
 White Plains, NY 10601-4150

Re: *Wolf, et al. v. Dolgen New York, LLC*  
 Case No.: 7:23-cv-00558-PMH

Dear Judge Halpern:

The Dann Law Firm and Milberg represent Plaintiffs Joseph Wolf, Carmen Wolf, and the putative class (collectively, the “Wolfs”) in the above referenced matter against Dolgen New York, LLC d/b/a Dolgen (“Dollar General”, the parties collectively, the “Parties”). In accordance with Rule 1(C) of Your Honor’s Individual Practices, the Wolfs submit this letter-motion requesting a brief, two-day extension of the Wolfs’ deadline to file their opposition to Dollar General’s letter request for a pre-motion conference for its anticipated motion for summary judgment, from June 24, 2024, to June 26, 2024.

On June 17, 2024, Dollar General filed its letter-motion. (D.E. 63). Pursuant to Rule 2(C) and Rule 5(E)(vii) of Your Honor’s Individual Practices, the Wolfs’ deadline to file their opposition is currently June 24, 2024. However, I will be out of the office on June 24, 2024, and likely on June 25, 2024, on vacation. Due to this, the Wolfs request this two-day extension in order to have sufficient time to file their response.

Dollar General consents to this request. This is the Wolfs’ first request to extend its deadline to respond to Dollar General’s pre-motion letter since receipt of the same.

Respectfully submitted,

**The Dann Law Firm, PC**

/s/ Javier L. Merino  
 Javier L. Merino, Esq.  
*Counsel for Plaintiffs and the Putative Class*

Cc: All Counsel of Record (via ECF)

NJ Address  
 1520 U.S. Highway 130, Suite 101  
 North Brunswick, NJ 08902

DannLaw.com  
 877-475-8100  
 \*Licensed in NJ and NY

NY Address  
 42 Broadway, 12th Floor  
 New York, NY 10007  
**By Appointment Only**